

Subject: Re: Dedmon v Shell
Date: Tuesday, October 22, 2024 at 3:30:18 PM Central Daylight Time
From: Amy Gibson <amy@gwfir.com>
To: Williams, Marlene C. <marlene.williams@ogletree.com>
CC: amanda@ahfirm.com <amanda@ahfirm.com>, David Wiley <david@gwfir.com>
Attachments: image002.jpg, image003.jpg

Fine with me.

From: Williams, Marlene C. <marlene.williams@ogletree.com>
Date: Tuesday, October 22, 2024 at 3:12 PM
To: Amy Gibson <amy@gwfir.com>
Cc: amanda@ahfirm.com <amanda@ahfirm.com>, David Wiley <david@gwfir.com>
Subject: RE: Dedmon v Shell

Amy, we are not opposed to your request for an additional two weeks with the caveat that we need to first agree on how we plan to present the impact of the extension on upcoming deadlines, including mediation and the JPO. I think you've already indicated you're open to working on an agreeable mediation date for some time after you file the response, but please confirm. Also, by my calculation the additional two weeks on your response would put our reply date after the JPO is due. Are you open to asking the Court for an extension on the JPO deadline?

Marlene

Marlene C. Williams | Ogletree Deakins
One Allen Center, 500 Dallas Street, Suite 2100 | Houston, TX 77002 | Telephone: 713-655-5769
marlene.williams@ogletree.com | www.ogletree.com | [Bio](#)

From: Amy Gibson <amy@gwfir.com>
Sent: Tuesday, October 22, 2024 1:35 PM
To: Williams, Marlene C. <marlene.williams@ogletreedekins.com>
Cc: amanda@ahfirm.com; David Wiley <david@gwfir.com>
Subject: Re: Dedmon v Shell

[Caution: Email received from external source]

Marlene,

Would you please let us know on the below?

Amy Gibson
Gibson Wiley PLLC

T: (214) 522-2121
F: (214) 522-2126
M: (214) 417-9233
E: amy@gwfir.com



From: Amy Gibson <amy@gwfir.com>
Date: Monday, October 21, 2024 at 4:54 PM
To: Williams, Marlene C. <marlene.williams@ogletree.com>
Cc: amanda@ahfirm.com <amanda@ahfirm.com>, David Wiley <david@gwfir.com>
Subject: Re: Dedmon v Shell

thanks

From: Williams, Marlene C. <marlene.williams@ogletree.com>
Date: Monday, October 21, 2024 at 4:49 PM
To: Amy Gibson <amy@gwfir.com>
Cc: amanda@ahfirm.com <amanda@ahfirm.com>, David Wiley <david@gwfir.com>
Subject: RE: Dedmon v Shell

Hi Amy. I'm checking with my client and will be back in touch by tomorrow with a response. I've already reached out to several mediators and have dates going into early November, as I anticipated we might need to look beyond November 1st. I think we'd prefer to mediate after you file your response, but let me confirm with my client and get back to you. I'll have an answer by tomorrow so that you can plan accordingly.

Marlene

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From: Amy Gibson <amy@gwfirm.com>
Sent: Monday, October 21, 2024 10:03 AM
To: marlene.williams@ogletree.com
Cc: amanda@ahfirm.com; david@gwfirm.com
Subject: Dedmon v Shell

[Caution: Email received from external source]

Marlene,

Hope all is well. I wanted to touch base on this case. Also left you a voicemail this morning.

Please let me know whether your side opposes a 14-day extension of time to file the msj response, which would be November 7, 2024. Due to the about 10 weeks of parents being ill, our schedule got crunched after that. For the response period here: The week of September 30 involved depositions including prep all 5 days. The week of October 7-10, we worked to complete an appellee brief defending a roughly \$2.5 million judgment after caps were applied to jury verdict. And last week, we were out all week for depositions in Midland. All of the foregoing is on top of other more routine deadlines.

Also, I wanted to touch base on documents, discovery, and mediation. We can go ahead and mediate before our msj response is due, if necessary. Or let me know if you want to move the mediation deadline. If we want to move it, we probably need a proposed date for the Court. We are not available on October 28 or 29. And if we want to move it, we will need to vet proposed mediation dates after Nov 1.

Amy Gibson

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T: (214) 522-2121

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